

GOLDSTEIN ISAACSON, PC

Andrew J. Goldstein (AG-7150)
 100 Morris Avenue, 3rd Floor
 Springfield, New Jersey 07081
 Telephone No. (973) 258-0500
 Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF NEW YORK**

Lakeland Bank, a New Jersey Charter
 State Bank, with its principal place of
 business at 250 Oak Ridge Road,
 Oak Ridge, New Jersey 07438,

: Civil Action No. 07-CIV-6823 (SAS)

Plaintiff,

**MOTION FOR ORDER
 FOR SALE OF VESSEL
 PURSUANT TO RULE E(9)**

-vs-

TAYLOR BABY in rem,
 EDWIN RYBACKI, in personam,
 RITA RYBACKI, in personam, and
 MARC RYBACKI, in personam

Defendants.

Plaintiff hereby moves before this Honorable Court for an Order permitting the sale of the vessel, Taylor Baby, *in rem*, on April 4, 2008 at 12:00 p.m., pursuant to Rule E (9) of the Supplemental Rules for Certain Admiralty and Maritime Claims. The plaintiff relies upon the accompanying Certification of Andrew J. Goldstein, Esq. in support of this motion. A proposed form of Order is also being submitted herewith.

GOLDSTEIN ISAACSON, PC
 Attorneys for Plaintiff

By:



ANDREW J. GOLDSTEIN

Dated: 2/29/08